

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

**COMMONWEALTH EDISON COMPANY’S INITIAL COMMENTS ON THE STAFF  
REPORT ENTITLED “PERFORMANCE AND TRACKING METRICS  
WORKSHOP SUMMARY”**

Commonwealth Edison Company (“ComEd”) submits these Initial Comments in response to the Illinois Commerce Commission (“Commission”) Staff Report entitled “Performance and Tracking Metrics Workshop Summary,” dated December 1, 2021 (the “Staff Report”). ComEd appreciates the opportunity to share comments and information with the Commission, Staff, and fellow workshop participants. ComEd also appreciates the time devoted by stakeholders to the workshop process, and the efforts of Staff in assembling the Staff Report.

Much of the Staff Report is dedicated to a summary of the recommendations made by various workshop participants. ComEd finds this portion of the Staff Report to be a fair and accurate summary of the recommendations and the discussion at the workshops. ComEd will consider the recommendations of workshop participants in developing and finalizing ComEd’s proposed metrics.

ComEd’s comments are limited to the Recommendations section of the Report, which outlines “guidance and principles” regarding Commission review of proposed metrics, and proposals for improving the workshop process. Among the Report’s proposals for workshop process improvements is a recommendation that the Commission consider creating a stakeholder advisory group to “continue performance and tracking metric development discussions between workshops.” Report at 35. While ComEd fully supports the spirit of this recommendation in terms of facilitating communication and collaboration, ComEd believes that a stakeholder advisory

group would be duplicative of other work required pursuant to Section 16-108.18, and would not materially enhance transparency in the development of metrics.

Section 16-108.18 requires significant data collection and annual reporting, which will be reviewed in docketed proceedings, open to public participation. In particular, the utilities must initiate a formal docketed proceeding concerning their proposed metrics in January 2022. 220 ILCS 5/16-108.18(e)(6)(A). That docketed proceeding will continue until approximately September 30, 2022, when the Commission enters an order approving metrics. *Id.* Between the time the metrics are approved and the time of the next workshop in 2025, the utilities will be collecting data on each metric, and submitting to the Commission annual “performance evaluation reports” that include data on each metric, along with an “independent evaluation of [] performance on metrics.” 220 ILCS 5/16-108.18(f)(1). These reports will, in turn, initiate docketed proceedings in which the Commission will ultimately approve a penalty or incentive based on the utility’s performance. 220 ILCS 5/16-108.18(f)(3).

The annual docketed proceedings concerning utilities’ performance against the approved metrics will provide stakeholders ample transparency regarding the metrics themselves, and potentially to develop proposals for presentation at workshops in 2025. As the Report itself notes, in addition to the upcoming Commission proceedings concerning the utilities’ proposed metrics, “[s]takeholders will also have additional opportunities to provide input as performance and tracking metrics are updated, refined, and revised over time.” Report at 35. Because interested stakeholders already have established opportunities to continue their engagement, communication, and collaboration regarding utility metrics, it is not necessary to create an additional layer of stakeholder process via a stakeholder advisory group. In light of this activity, an additional stakeholder process may prove burdensome to the utilities, Commission Staff, and the participants.

Dated: December 10, 2021

Respectfully submitted,  
COMMONWEALTH EDISON COMPANY